

EXHIBIT "B"

AFFIDAVIT OF LINDSAY KOROTKIN IN SUPPORT OF PHILIPPINES
TRADEMARK OPPOSITION OF RBK

1. My name is Lindsay Korotkin and I am an attorney at Arent Fox LLP, 1675 Broadway, New York, NY 10019.
2. I have personal knowledge as to the facts and statements made in this Affidavit based on my representation of TRB Acquisitions LLC and the documents they have provided to me. I make these statements to the best of my knowledge.
3. TRB Acquisitions LLC ("TRB") is the owner and licensor of the RBX trademark as depicted below:

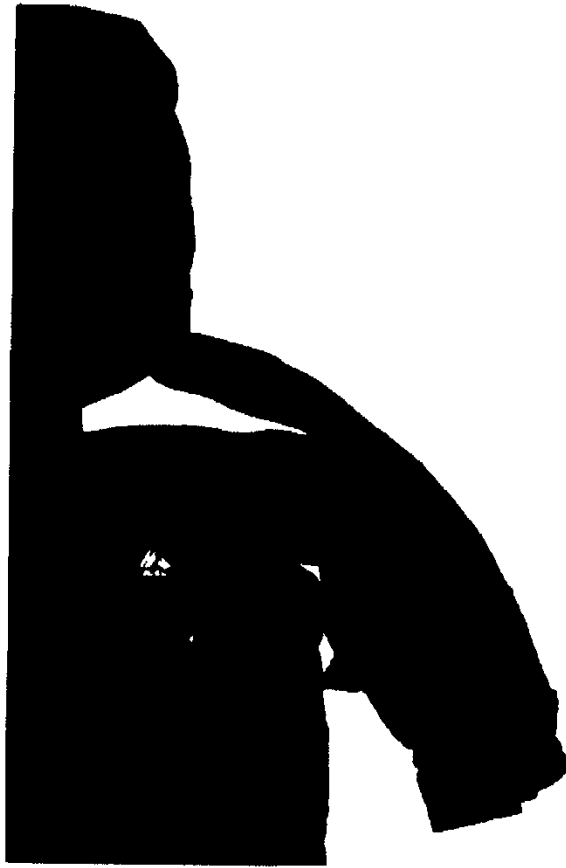


4. In March 2011, TRB acquired all right, title, and interest in and to the RBX trademarks from its predecessor-in-interest, The Rugged Bear Company f/d/b/a RB Acquisition Corp., a Delaware Corporation ("RBC").
5. RBC was founded in and about 1980, as a family business by Alan McDonough, who was previously a co-founder of the highly successful outdoor adult clothing and gear retailer Eastern Mountain Sports. Alan McDonough founded RBC, in part, to offer for children the same high-quality, durable outwear that Eastern Mountain Sports was known for in the adult outdoor clothing field. See Exhibit 1 (Internet Archive Wayback Machine archived RBC webpages detailing the company and its history from 1998 to 2010).

6. Since the early 1980's, RBC operated retail stores throughout the New England area of the United States of America, as well as the states of New York, and New Jersey, selling a wide variety of children's apparel, footwear, and accessories. RBC was a beloved brand, known for selling high quality, well-designed apparel, footwear, and accessories at reasonable prices.

7. On or before March 2005, RBC designed and created the RBX trademark (an abbreviation of "Rugged Bear Xtreme") and the distinctive logo as shown below, and used the marks in connection with the sale and marketing of apparel and accessories from as early as Fall 2006 to 2011.





8. RBX.com LLC is a New York, United States of America limited liability company that was formed on Feb. 9, 2015 to create and run the www.Rbxactive.com website and e-commerce store, as well as the RBX social media accounts. All of these serve advertising and marketing functions and help promote the RBX brand and expand the RBX brand's global reach through internet and social media presence.

9. Attached as Exhibit 2 is a chart detailing the advertising and marketing expenditures of TRB Acquisitions LLC for the RBX brand.

10. Attached as Exhibit 3 is a chart detailing the advertising and marketing expenditures of RBX.com LLC all in support of the RBX brand.

11. Attached as Exhibits 4-7 are brand books that have been circulated by TRB Acquisitions LLC from 2012-2015 regarding the RBX trademark and the RBX brand.

12. In or around November 2012, the RBX brand was represented in the New York City Marathon for the first time. *See* Exhibit 7, p. 4.

13. In or around 2014, the RBX brand hit \$90 million USD in wholesale revenue. *See* Exhibit 7, p. 4.

14. In or around September 2014, the RBX brand was represented in an Iron Man Competition for the first time. *See* Exhibit 7, p. 4.

15. The RBX products are available for sale and the brand is well-known in the United States of America.

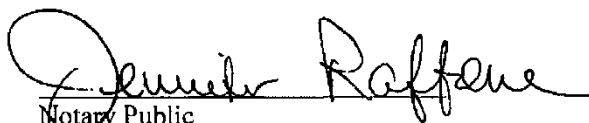
16. The RBX brand has international reach. Attached as Exhibits 8 are true and correct copies of trademark registration certificates for the RBX trademark in the United States of America, Australia, China, Hong Kong, Colombia, Dominican Republic, Guatemala, Morocco, Norway, South Korea and Switzerland.

[signature on the next page]



Lindsay Korotkin Esq.

Sworn to before me this 24th day of May, 2016


Notary Public

Jennifer Raffone
Notary Public, State of New York
No. 01RA6017639
Qualified in Richmond County
Commission Expires January 29, 20 19